

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED

2019 OCT 17 PM 2:58

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY MCKENNA,

Defendant.

) INDICTMENT

) CASE NO.

4:19 CR 623  
Title 18, United States Code,  
Sections 1341

JUDGE OLIVER

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. Defendant TIMOTHY MCKENNA, was a United States Citizen and a resident of Ohio.
2. From in and around June of 2009, until in and around November of 2017, MCKENNA falsely represented to businesses that he was chairman of the Youngstown Air Reserve Station, 910th Operations Group Booster Club.
3. MCKENNA distributed, and caused to be distributed, by the United States mail and otherwise, letters soliciting donations in the form of gifts from businesses on behalf of the Youngstown Air Reserve Station, 910<sup>th</sup> Operations Group Booster Club.
4. MCKENNA falsely represented in these letters that the gifts would be given away as prizes at a Christmas Ball.
5. MCKENNA falsely represented that the gifts were for people who have been deployed all year and provide vital support operations at the base.
6. MCKENNA falsely represented that the Youngstown Air Reserve Station, 910<sup>th</sup> Operations Group Booster Club exists.

8. MCKENNA falsely represented that he was acting on behalf of the Department of the Air Force by sending the letters on Air Force letterhead.

9. After receiving the gifts, MCKENNA kept some of the gifts for himself.

COUNTS 1-6  
(Mail Fraud, 18 U.S.C. § 1341)

The Grand Jury charges:

10. Paragraphs 1-7 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

11. From on or about June 11, 2009, until on or about November 4, 2017, in the Northern District of Ohio and elsewhere, the Defendant TIMOTHY MCKENNA, with the intent to defraud, devised the above-described scheme and artifice to defraud and obtain property by materially false and fraudulent pretenses, representations, and promises, as more fully described above, and for the purpose of executing and attempting to execute said scheme and artifice to defraud, knowingly transmitted and caused matters to be placed in any post office and authorized deposits for mail matter, to be sent and delivered by the United States Postal Service, in accordance with the directions thereon, each mailing constituting a separate count:

Count	Approximate Date	Named Recipient	Content of Mailed Matter
1	June 11, 2009	Hemlock Springs Golf Club	Letter
2	November 5, 2012	The Lodge at Geneva on the Lake	Letter
3	October 3, 2013	Corning Museum of Glass	Letter
4	November 28, 2014	O'Charley's Boardman	Letter
5	October 17, 2015	Choo Choo Barn	Letter
6	November 4, 2017	Oglebay Park	Letter

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.